

## EXHIBIT A

| UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ALABAMA   |  | PROOF OF CLAIM  |
|---|--|---|
| Name of Debtor:<br><b>JEFFERSON COUNTY, ALABAMA</b>   | Case Number:<br><b>11-05736 (TBB)</b>  |   |
| NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing. You may file a request for payment of an administrative expense according to 11 U.S.C. § 503.   |  |   |
| Name of Creditor (the person or other entity to whom the debtor owes money or property):<br><b>Estate of Tekaya Clark</b>   |  | <input type="checkbox"/> Check this box if this claim amends a previously filed claim.<br><br><b>Court Claim Number:</b> _____<br>(If known)<br><br>Filed on: _____   |
| Name and address where notices should be sent: Name ID: 10556254 Pack No. 13<br><b>Estate of Tekaya Clark</b><br><b>c/o Richard Horsley 2545 Highland Ave.</b><br><b>1 Metroplex Drive B'ham, AL 35205</b><br><b>Birmingham, AL 35209-0000</b><br><br>Telephone number: <b>205-212-6195</b> email: <b>RFHALA@CS.COM</b>   |  |   |
| Name and address where payment should be sent (if different from above):<br><b>Richard Horsley</b><br><b>2545 Highland Ave</b><br><b>B'ham, AL 35205</b><br><br>Telephone number: <b>205-212-6195</b> email: <b>RFHALA@CS.COM</b>   |  | <input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.<br><br><b>5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount.</b><br><br><input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).<br><input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier – 11 U.S.C. §507 (a)(4).<br><input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507 (a)(5).<br><input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507 (a)(7).<br><input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507 (a)(8).<br><input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507 (a)( ).<br><br><b>Amount entitled to priority:</b><br>\$ _____<br><br>* Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment. |
| <b>1. Amount of Claim as of Date Case Filed: \$ 5,000,000 12/5/11</b><br>If all or part of the claim is secured, complete item 4.<br>If all or part of the claim is entitled to priority, complete item 5.<br><input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.   |  |   |
| <b>2. Basis for Claim: Wrongful Death</b><br>(See instruction #2)   |  |   |
| <b>3. Last four digits of any number by which creditor identifies debtor:</b><br><u>  n/a  </u>   | <b>3a. Debtor may have scheduled account as:</b><br>_____<br>(See instruction #3a) | <b>3b. Uniform Claim Identifier (optional):</b><br>_____<br>(See instruction #3b)   |
| <b>4. Secured Claim (See instruction #4)</b><br>Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information.<br><br><b>Nature of property or right of setoff:</b> <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other<br><b>Describe:</b><br><b>Value of Property: \$</b> _____ <b>Annual Interest Rate</b> _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable<br>(when case was filed)<br><b>Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$</b> _____ <b>Basis for perfection:</b> _____<br><br><b>Amount of Secured Claim: \$</b> _____ <b>Amount Unsecured: \$</b> _____ |  |   |
| <b>6. Credits.</b> The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)   |  |   |
| <b>7. Documents:</b> Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #7, and the definition of "redacted".)<br><br>DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.<br><br>If the documents are not available, please explain:  |  |   |
| <b>8. Signature:</b> (See instruction #8) Check the appropriate box.<br><input type="checkbox"/> I am the creditor. <input checked="" type="checkbox"/> I am the creditor's authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. <input type="checkbox"/> I am a guarantor, surety, indorser, or other codebtor.<br>(Attach copy of power of attorney, if any.) (See Bankruptcy Rule 3004.) (See Bankruptcy Rule 3005.)   |  |   |
| I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.<br>Print Name: <u>Richard F. Horsley</u><br>Title: <u>Attorney</u><br>Company: <u>Richard F. Horsley LLC</u> (Signature) _____ (Date) <u>5/15/12</u><br>Address and telephone number (if different from notice address above):<br><u>2545 Highland Ave.</u><br><u>B'ham, AL</u><br>Telephone number: <u>205-212-6195</u> Email: <u>RFHALA@CS.COM</u>  |  |   |

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.



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KURTZMAN CARSON CONSULTANTS

COURT USE ONLY

## UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ALABAMA

In re Jefferson County, Alabama, Case Number 11-5736-TBB-9

11 U.S.C. §  
503(b)(9)  
REQUEST  
FORM

**NOTE:** This form is to be used **ONLY** to make a claim for payment of an administrative expense pursuant to 11 U.S.C. § 503(b)(9) (a "Section 503(b)(9) Claim") in accordance with the accompanying notice (the "Notice"). Section 503(b)(9) Claims are claims for the value of goods sold by a party to Jefferson County, Alabama (the "County") in the ordinary course of the County's business and received by the County within 20 days before November 9, 2011. If your claim against the County is not a Section 503(b)(9) Claim, or you have other claims against the County in addition to your Section 503(b)(9) Claim, then you may be required to file a separate proof of claim against the County. The Notice will instruct you whether you must file a proof of claim against the County, where to file the proof of claim and the deadlines for filing proofs of claim. Do **NOT** use this form if your claim is not a Section 503(b)(9) Claim. If you wish to assert a Section 503(b)(9) Claim against the County, complete this form and return it in accordance with the below instructions. **PLEASE NOTE that filing a request for allowance of a Section 503(b)(9) Claim does not ensure that your Section 503(b)(9) Claim will be allowed or paid.**

**INSTRUCTIONS:** To assert a Section 503(b)(9) Claim against the County, complete this form and send the completed form by overnight courier, hand delivery or mail to Kurtzman Carson Consultants LLC, the Claims Agent in the County's Chapter 9 Case (the "Claims Agent"), at the applicable address below so as to be **received** by no later than **5:00 p.m. prevailing Central Time on Monday, June 4, 2012**. Request forms submitted by facsimile or e-mail will **NOT** be accepted.

By Mail, Hand Delivery, or Overnight Delivery:  
Jefferson County Claims Processing  
c/o Kurtzman Carson Consultants LLC  
2335 Alaska Avenue  
El Segundo, CA 90245

**Name of creditor (the person or other entity to whom the County owes money or property):**

Estate of Tekaya Clark

**Any applicable business account names or numbers used by creditor and/or County:**

**Name and address where notices related to this § 503(b)(9) Request should be sent:** Name ID: 10556254 Pack No. 13

Estate of Tekaya Clark

c/o Richard Horsley *2545 Highland Ave.*  
~~1 Metroplex Drive~~  
Birmingham, AL ~~35209-0000~~ *35205*  
Telephone number: *205-212-6195*

☐ Check box if you have never received any notices from the Bankruptcy Court in this case

☐ Check box if your address differs from the address on the envelope sent to you by the County.

**1. Description of Basis of § 503(b)(9) Claim** (including description of goods, date(s) of delivery/receipt by County):

**2. Total Amount of asserted § 503(b)(9) Claim** (attach itemization and supporting documents): \$

**3. Credits:** The amount of all payments, if any, on this claim has been credited and deducted for the purpose of making this § 503(b)(9) Request.

**4. Other Supporting Documents:** Attach copies of any and all supporting documents, such as purchase orders/invoices, itemized statements of running accounts, contracts, and documents evidencing delivery/receipt of goods. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, please explain. If the documents are voluminous, please attach a summary.

**5. Date-Stamped Copy:** To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and a copy of this Request.

**Date** *5/16/12* **Sign and print the name and title, if any, of the creditor or other person authorized to file this claim:**

*[Signature]* *Attorney for the Estate of Tekaya Clark*

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.



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**ESTATE OF TEKAYA CLARK,**

**Plaintiff,**

**v.**

**JEFFERSON COUNTY and JEFFERSON COUNTY  
SHERIFF'S DEPARTMENT; DEPUTY WOODS,  
DEPUTY LANE, DEPUTY GODBER, DEPUTY SANDERS,  
DEPUTY ROBERSON, SARGEANT PARK, and DEPUTY  
COMANS;**

**Defendant.**

**NOTICE OF CLAIM**


On or about August 7, 2011, Tekaya Clark, the decedent, was the victim of a homicide at her place of residence, 1836 Oakleaf Lane, Birmingham, AL 35215. Prior to the homicide, the victim placed a 911 telephone call to report a potential burglary in progress. The above listed deputies and officers were dispatched to the address at approximately 3:30 a.m. and arrived at approximately 3:32 a.m. Those deputies and law enforcement officers were made aware by the 911 dispatcher that gunshots were fired in the subject residence. Said deputies and officers were on the scene when the dispatcher heard gunshots; however, since the deputies and officers did not hear those gunshots they chose not to enter the residence.

Rather, the deputies and officers waited until approximately 4:40 a.m. to contact a SWAT team, and the SWAT team did not arrive until approximately 5:30 a.m. The deputies and officers then contacted a hostage negotiator. The SWAT team did not enter the residence until approximately 6:50 a.m. The victim was found dead inside the residence. The victim is believed to have bled to death as a result of multiple stab wounds.

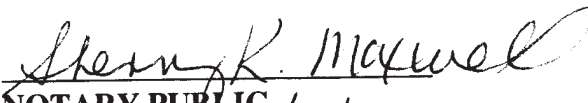
Jefferson County, the Jefferson County Sheriff's Dept., and the above listed deputies and officers acted negligently in failing to enter the victim's home when they were initially notified of gunshots. The victim was not shot and very likely remained alive for a significant period of time while the deputies and officers chose to remain outside the residence from approximately 3:32 a.m. until 6:50 a.m. It is believed that the victim died from blood loss during that time. The family and Estate of Tekaya Clark hereby provides notice to Jefferson County, Jefferson County's Sheriff's and the above listed deputies and officers of their claim for negligence and wrongful death on behalf of the decedent, Tekaya Clark. The family and Estate of Tekaya Clark hereby demand damages against Jefferson County, the Jefferson County's Sheriff's Department and the above listed deputies and officers for the maximum amount allowed by law.

JEFFERSON COUNTY SHERIFF'S DEPT  
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Respectfully submitted,

  
**Richard Horsley, LLC**  
**Attorney for the family and Estae of**  
**Tekaya Clark**

**SWORN** to and **SUBSCRIBED** before me on this 25<sup>th</sup> day of October, 2011.

  
**NOTARY PUBLIC**  
My Commission Expires: 6/6/14

NOTARY PUBLIC DEPT

2011 DEC -5 AM 9:41

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